

United States Bankruptcy Court
District of Massachusetts

In re

Anwar Ibrahim.

Case no. 16 - 13549

Debtor.

Ch. 13

U.S. BANKRUPTCY COURT
2017 MAR -8 P 4: 28

Expedited

Debtors motion for a new court date for a hearing to the Trustees objection of Declaration of Homestead

Now comes the Debtor Anwar Ibrahim to ask this Honorable Court for a new hearing date in regards to the Trustees objection to the Declaration of Homestead and a new deadline to respond to that objection due to the following facts:

The Debtor had filed a motion for an extension to respond to the Trustees objection of Homestead on March 1, 2017 which this court granted an extension to March 9 2017. In his motion the Debtor had stated he was going to meet his former bankruptcy attorney on Monday March 6, 2017 to get his bankruptcy files from her so he could hire a new attorney to file his response to the Trustees objection of the Declaration of Homestead.

Since then the Debtor has been in the Malden District Court to respond to a motion filed by one of his creditors Goshen mortgage REO and their Attorney Edward Gainer. That motion was scheduled for a hearing on Monday March 6, 2017 - the same day the Debtor was supposed to meet with his former Bankruptcy Attorney, consequently the Debtor had to cancel that meeting so he can go to Malden District Court to oppose Goshen mortgage Reo's motion. When he went to the Malden District Court the motion hearing was rescheduled for today March 8th 2017

The Debtor had filed an injunction motion on Monday March 6, 2017 with this Honorable Court to stop the hearing at Malden District Court. This Honorable Court has scheduled a hearing for damages due to the violations of the automatic stay by Goshen Mortgage Reo on March 16th 2017. Due to the fact the Debtor was not able to meet with his former bankruptcy attorney as scheduled on Monday March 6, 2017 because of the hearing at Malden District Court on the same date and getting ready for the second hearing today March 8th 2017 the Debtor hasn't had the time and space he needed to talk to other bankruptcy attorneys who could research and file a response to the Trustees objection of the Declaration of Homestead. The Debtor respectfully asks this Honorable Court to reschedule the hearing set for March 16th, 2017 in regards to the Trustees objection to the Declaration of Homestead by one month and to give

John M. Fanning